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December 22, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: *Drummond Company, Inc., et al. v. VICE Media LLC*, Case No. 1:21-mc-00859

Dear Judge Nathan:

We represent Respondent VICE Media LLC (“VICE”) in the above-captioned matter. On December 15, 2021, Petitioners Drummond Company, Inc. and Drummond Ltd. (“Drummond”) filed a motion to compel VICE’s compliance with a subpoena or, alternatively, to transfer. Doc. 1. In its motion, Drummond requested that the Court set a briefing schedule jointly proposed by the parties. Pursuant to Rule 1.E of Your Honor’s Individual Practices, we respectfully request that the Court enter a slightly modified briefing schedule for the motion as follows:

- VICE’s opposition to Drummond’s motion shall be due on February 8, 2022 (the originally proposed deadline is January 18, 2022).
- Drummond’s reply in further support of its motion shall be due on February 25, 2022 (the originally proposed deadline is January 31, 2022).

No previous requests for an extension have been made. In light of scheduling conflicts, the upcoming holidays, and the changing situation with regard to the COVID-19 pandemic, the additional time requested will give VICE a full opportunity to prepare its opposition. Drummond consents to this request. The requested schedule would not affect any other deadlines in this matter.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Rachel F. Strom', written over the printed name.

Rachel Strom

cc: All counsel of record (by ECF)

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